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Attorneys for Defendants  
Facebook, Inc., Mark Zuckerberg, Christopher Cox, Javier  
Olivan, Samuel Lessin, Michael Vernal, and Ilya Sukhar

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN MATEO

SIX4THREE, LLC, a Delaware limited liability  
company,

Plaintiff,

v.

FACEBOOK, INC., a Delaware corporation;  
MARK ZUCKERBERG, an individual;  
CHRISTOPHER COX, an individual;  
JAVIER OLIVAN, an individual;  
SAMUEL LESSIN, an individual;  
MICHAEL VERNAL, an individual;  
ILYA SUKHAR, an individual; and  
DOES 1-50, inclusive,

Defendants.

Case No. CIV 533328

**Assigned for all purposes to Hon. V. Raymond  
Swope, Dept. 23**

**DECLARATION OF ZACHARY G.F.  
ABRAHAMSON IN SUPPORT OF  
DEFENDANT FACEBOOK, INC.'S MOTION  
TO SEAL**

Date: July 19, 2019  
Time: 2:00 p.m.  
Dept: 23 (Complex Civil Litigation)  
Judge: Honorable V. Raymond Swope

FILING DATE: April 10, 2015  
TRIAL DATE: April 25, 2019

1 I, Zachary G.F. Abrahamson, declare as follows:

2 1. I am a lawyer with the law firm Durie Tangri LLP, counsel of record for Defendant  
3 Facebook, Inc. ("Facebook") in the above-captioned matter. I provide this declaration in support of  
4 Facebook's Motion to Seal. I declare that the following statements are true to the best of my knowledge,  
5 information, and belief, formed after a reasonable inquiry under the circumstances. If called upon to  
6 testify, I could and would competently testify thereto.

7 2. Exhibits 1 and 2 to the Declaration of Zachary G.F. Abrahamson in Support of Defendant  
8 Facebook, Inc.'s *Ex Parte* Application for an Order Shortening Time for Depositions contain summaries  
9 of information contained in documents Facebook designated as confidential or highly confidential under  
10 the Protective Order. These summaries mischaracterize and misrepresent the underlying documents, but  
11 nevertheless describe protected information from Facebook's confidential and highly confidential  
12 documents, such as internal business discussions about possible business policies and business plans.  
13 The disclosure of this information would harm Facebook's business.

14 I declare under the penalty of perjury that the foregoing is true and correct. Executed this 17th  
15 day of April, 2019, in San Francisco, California.

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19 ZACHARY G. F. ABRAHAMSON  
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**PROOF OF SERVICE**

I am employed in San Francisco County, State of California, in the office of a member of the bar of this Court, at whose direction the service was made. I am over the age of eighteen years, and not a party to the within action. My business address is 217 Leidesdorff Street, San Francisco, CA 94111.

On April 17, 2019, I served the following documents in the manner described below:

**DECLARATION OF ZACHARY G.F. ABRAHAMSON IN SUPPORT OF  
DEFENDANT FACEBOOK, INC.'S MOTION TO SEAL**

☒ BY ELECTRONIC SERVICE: By electronically mailing a true and correct copy through Durie Tangri's electronic mail system from zabrahamson@durietangri.com to the email addresses set forth below.

On the following part(ies) in this action:

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*Attorney for Birnbaum & Godkin, LLP*

1 I declare under penalty of perjury under the laws of the United States of America that the  
2 foregoing is true and correct. Executed on April 17, 2019, at San Francisco, California.

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5 ZACHARY G.F. ABRAHAMSON  
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